

the Stipulation is granted.

SO ORDERED.

Alvin K. Hellerstein

September 14, 2021

**UNITED STATES DISTRICT COURT  
SOUTHERN DISTRICT OF NEW YORK**

STEPHEN HARTEL, Individually and On  
Behalf of All Others Similarly Situated,

Plaintiff,

v.

SELECTQUOTE, INC., TIM DANKER,  
and RAFFAELE SADUN,

Defendants.

Case No. 1:21-cv-06903-AKH

**STIPULATION AND  
[PROPOSED] ORDER**

Plaintiff Stephen Hartel (“Plaintiff”) and Defendants SelectQuote, Inc., Tim Danker, and Raffaele Sadun (collectively, “Defendants,” and together with Plaintiff, the “Parties”), by and through their undersigned counsel, hereby stipulate and agree as follows and jointly request that the Court enter the below Order approving this Stipulation:

WHEREAS, the Class Action Complaint for violations of the federal securities laws (the “Initial Complaint”) was filed in this action on August 16, 2021; and

WHEREAS, this action is a private securities class action litigation subject to the Private Securities Litigation Reform Act of 1995 (“PSLRA”), 15 U.S.C. § 78u-4;

WHEREAS, the Parties anticipate that, after the Court has designated a lead plaintiff pursuant to 15 U.S.C. § 78u-4(a)(3)(B) (“Lead Plaintiff”), the Lead Plaintiff will file a consolidated class action complaint;

WHEREAS, the Parties have met and conferred, and agree that a response from Defendants to the Initial Complaint, which will in all likelihood be superseded by a consolidated or amended class complaint filed by the Lead Plaintiff, would invite waste, duplicative effort, and needless expenditure of judicial and party resources;

NOW THEREFORE, IT IS HEREBY STIPULATED AND AGREED THAT:

1. Defendants shall accept service of the Initial Complaint;
2. Defendants shall not be required to answer, move to dismiss, or otherwise respond to the Initial Complaint until after a Lead Plaintiff has been appointed and Lead Plaintiff has filed an amended complaint (if any); and
3. Within fourteen (14) days of appointment of Lead Plaintiff pursuant to 15 U.S.C. § 78u-4, counsel for Lead Plaintiff and Defendants shall meet and confer regarding scheduling and shall submit a stipulation for the Court's approval with the Parties' proposed schedule for the filing of an amended complaint (if any) and the filing of any motion to dismiss.
4. Nothing herein shall be deemed to constitute a waiver of, and the Defendants do not waive and expressly preserve, all arguments and defenses in the above-captioned action, including defenses related to personal jurisdiction notwithstanding Defendants' agreement to accept service of the Initial Complaint.

Dated: August 26, 2021

By: /s/ Gregory B. Linkh  
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*Counsel for Plaintiff Scott Bishins and Lead Plaintiff Movant Darshan Hashthantra*

Dated: August 26, 2021

By: /s/ David B. Anders

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*Counsel for Defendants*

SO ORDERED this \_\_\_\_ day of \_\_\_\_\_, 2021.

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Judge Alvin K. Hellerstein

**CERTIFICATE OF SERVICE**

I hereby certify that on August 26, 2021, I electronically filed the foregoing with the Clerk of the Court using the CM/ECF system, which sent notification of such filing to all attorneys of record.

Respectfully submitted,

/s/ Gregory B. Linkh  
Gregory B. Linkh